

EPA Official Record

Notes ID: 25CFB69E4EA4F45E0E37577A99DB535C

From: Barbara Ritchie <BARBARA.RITCHIE@fmc.com>

To: Kevin Rochlin/R10/USEPA/US@EPA

Delivered Date: 12/06/2012 10:23 AM PST

Subject: FW: Phosphorus Slag

Kevin -

I wanted to confirm that there is no requirement, provision for or implication that either Company (FMC or Monsanto) will "take slag back" (to their plant sites) in the AOC, GDGs, Fact Sheets, exposure study documentation or other community slag study related documentation (e.g., SE Id Health District Webpage).

The only historic occasion when slag was returned to the FMC site occurred with one load Bannock Paving had shipped on the day (or maybe a day or so after) which FMC voluntarily agreed to suspend slag sales.

The landfill referenced below is the same "everyone" uses in Bannock County and I would suspect that it has received a lot of slag over the years in loads of C&D. That is a logical result of the "attrition" mechanism to reduce slag risk over time as noted in the Fact Sheets and SE ID Health District webpage:

Attrition:

Attrition means removing slag once a structures' useful life has ended.

This would involve listing the building on the phosphorus slag inventory and subsequent removal of the slag to an appropriate disposal location when the building is demolished.

From: Thomas.Mullican@deq.idaho.gov
[mailto:Thomas.Mullican@deq.idaho.gov]
Sent: Tuesday, December 04, 2012 11:01 AM
To: Aaron.Galer@Williams.com; Douglas.Tanner@deq.idaho.gov; Barbara Ritchie; Rochlin.Kevin@epamail.epa.gov
Cc: Orville.Green@deq.idaho.gov; Dean.Nygard@deq.idaho.gov; Scott.Miller@deq.idaho.gov; Derek.Forsberg@Williams.com
Subject: RE: Phosphorus Slag

I am assuming that the slag is local to the Pocatello area. If that assumption is correct, I suggest a call to Therese Marchetti at the Bannock County Fort Hall Mine Landfill to see if they will dispose the slag in their C&D landfill. Her phone number is 208-236-0607.

Tom

Thomas W. Mullican

Hydrogeologist/Solid Waste

Idaho Department of Environmental Quality

444 Hospital Way #300

Pocatello, ID 83201

Phone: 208-236-6160

Fax: 208-236-6168

Email: Thomas.Mullican@deq.idaho.gov

From: Galer, Aaron [mailto:Aaron.Galer@Williams.com]

Sent: Monday, December 03, 2012 12:05 PM

To: Douglas Tanner; BARBARA.RITCHIE@fmc.com;
Rochlin.Kevin@epamail.epa.gov

Cc: Orville Green; Dean Nygard; Thomas Mullican; Scott Miller; Forsberg,
Derek

Subject: RE: Phosphorus Slag

Hi all,

I still need a response on the following:

· Kevin Rochlin and/or Barb Ritchey - Will FMC take back the slag from this property?

· DEQ's Solid Waste Officer- Are there any approved C&D landfills in the area?

Aaron Galer, REM

Environmental Compliance

Senior Environmental Scientist

Office: 801.584.6746 Cell: 801.244.1219

295 Chipeta Way # 1, Salt Lake City, UT 84108-1285

cid:image002.jpg@01C8C7DC.05AC9C70

From: Douglas.Tanner@deg.idaho.gov [<mailto:Douglas.Tanner@deg.idaho.gov>]
Sent: Friday, October 26, 2012 2:28 PM
To: Galer, Aaron; BARBARA.RITCHIE@fmc.com; Rochlin.Kevin@epamail.epa.gov
Cc: Orville.Green@deg.idaho.gov; Dean.Nygard@deg.idaho.gov; Thomas.Mullican@deg.idaho.gov; Scott.Miller@deg.idaho.gov
Subject: RE: Phosphorus Slag

Aaron,

My apologies up front for not having a straight forward answer for you. I think so is about as definitive as I can get. In 1996, FMC entered into an Agreement on Consent that addressed FMC actions in regard to slag. It was my understanding that a part of that agreement was that FMC was to take back uncontaminated slag. However, I have not been able to come up with a copy of the 1996 AOC to verify that. In 2003, I participated in a meeting and have notes that FMC committed to take back uncontaminated slag, not sure if this was a voluntary action or a condition of the AOC.

Since then, CERCLA work has progressed on FMC site, and an EPA Interim Record of Decision has been finalized that addresses what actions FMC is to take on the existing slag pile. Based on where the EPA and FMC are currently at with the Interim Record of Decision, I don't know if using the FMC slag pile as a repository is viable option at this time even if the 1996 AOC states that it can or it is now superseded. Kevin Rochlin and Barb Ritchey, FMC's Environmental Manager would have to weigh in on that answer.

That said, slag is listed as a solid waste by the EPA and can be relocated to an approved C&D landfill if the landfill will accept it. While awaiting a response back from FMC and the EPA, I have DEQ's Solid Waste Officer copied who may be able to tell us as to whether there are appropriate C&D locations. dt

From: Galer, Aaron [<mailto:Aaron.Galer@Williams.com>]
Sent: Friday, October 26, 2012 12:42 PM
To: Douglas Tanner
Cc: Rochlin.Kevin@epamail.epa.gov; Orville Green; Dean Nygard
Subject: Re: Phosphorus Slag

Does FMC still take back the slag? If not, what are our disposal options?

Sent from my iPhone

On Oct 26, 2012, at 12:34 PM, "Douglas.Tanner@deg.idaho.gov" <Douglas.Tanner@deg.idaho.gov> wrote:

Aaron,

Please call me at 208-236-6160 or I would be happy to respond to any

questions you pose through email. If you would like I could also include in a call with us, Kevin Rochlin who is the EPA Remedial Project Manager for the FMC OU. dt

From: Dean Nygard
Sent: Friday, October 26, 2012 11:36 AM
To: Aaron.Galer@Williams.com
Cc: Douglas Tanner; Orville Green
Subject: Phosphorus Slag

Aaron,

Doug Tanner in the DEQ Pocatello office can best address phosphorus slag questions. I've cc:'d Doug on this e-mail or you can call him (208) 236-6160.

Dean

From: Galer, Aaron [<mailto:Aaron.Galer@Williams.com>]
Sent: Friday, October 26, 2012 10:01 AM
To: Orville Green
Subject: Phosphorus Slag

Can you point me toward the right person at IDEQ to talk to about phosphorus slag on a piece of property we've been leasing and are looking at purchasing?

Aaron Galer, REM

Environmental Compliance

Senior Environmental Scientist

Office: 801.584.6746 Cell: 801.244.1219

295 Chipeta Way # 1, Salt Lake City, UT 84108-1285

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